

The Law Office of Ryan Lozar, P.C.  
305 Broadway, 9th Floor, New York, NY 10007  
Tel: (310) 867-1562; Alternate Tel: (646) 666-8262; Fax (877) 666-4456  
ryanlozar@gmail.com  
www.ryanlozar.com/www.luchaportusderechos.com



APRIL 27, 2016

The Hon. Jack B. Weinstein  
The Hon. Lois Bloom  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11217

Dear Judge Weinstein and Judge Bloom,

I represent Plaintiffs in the above-captioned Section 1983 action. Earlier today Plaintiffs posted a First Amended Complaint on the docket. Just moments ago, Plaintiffs posted a Second Amended Complaint which is meant to be the operative pleading going forward. I submit this status report with Defendants' permission to explain why this almost-immediate amendment occurred because I can imagine that the Court found this activity curious.

Plaintiffs' statute of limitations expires tonight at midnight. Until today, Plaintiffs' claims were in part levied against John Doe Defendants. In recent weeks the Parties worked to identify the John Doe Defendants and Plaintiffs' First Amended Complaint succeeded with respect to some of these.

Roughly one hour ago, with Plaintiffs' First Amended Complaint already filed, Defense counsel unexpectedly received information which permitted him to identify another John Doe Defendant. Defense counsel also learned that one of the Defendants that Plaintiffs named in the First Amended Complaint had not been involved in the incident under study. Plaintiffs' Second Amended Complaint corrects the aforementioned errors.

I regret the confusion and I am grateful for the Court's patience.

Sincerely,

A handwritten signature in blue ink that reads 'Ryan Lozar' with a stylized flourish at the end.  
Ryan Lozar  
Attorney for Plaintiffs